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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION

10 UNITED STATES OF AMERICA,)	No. CR-11-00742 SBA
)	
11 Plaintiff,)	STIPULATED REQUEST TO CONTINUE
)	HEARING DATE TO DECEMBER 12,
12 v.)	2011 AND TO EXCLUDE TIME UNDER
)	THE SPEEDY TRIAL ACT AND ORDER
13)	
14 VISHAL DASA,)	
ANJI REDDY DIRISINALA,)	Hearing Date: November 7, 2011
15 RAMAKRISHNA REDDY KARRA, and)	Time: 10:00 a.m.
TUSHAR TAMBE)	
)	
16 Defendants.)	
)	
17)	

18 The above-captioned matter is set on November 7, 2011 before this Court for a status
19 hearing. The parties jointly request that the Court continue the matter to December 12, 2011, at
20 10:00 a.m., before this Honorable Court, and that the Court exclude time under the Speedy Trial
21 Act, 18 U.S.C. § 3161, between November 7, 2011 and December 12, 2011, so that the defense
22 can have more time to review and assess the discovery in this case.

23 On October 7, 2011, the United States Attorney filed a one-count Information charging
24 defendants with conspiracy to commit visa fraud in violation of 18 U.S.C. §§ 371 and 1546(a).
25 On October 11, 2011, the defendants appeared before the magistrate court, waived Indictment
26 and were arraigned. Defendants face a maximum sentence of five years imprisonment on this

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1 charge.

2 By way of background, this case is related to a larger investigation involving Tri-Valley
3 University ("TVU"), which the government has alleged was a sham university that accepted
4 foreign students and issued legal status for these students without requiring that they attend
5 classes. *See* Indictment in *United States v. Susan Su*, CR 11-00288-SBA. The upcoming status
6 date would be the first district court appearance for the four charged defendants in this related
7 case.

8 The defense requests additional time to review the discovery that the government has
9 already produced, which includes voluminous files from TVU computers that the government
10 seized and that the defendants need to review. Additionally, the defense has requested that the
11 government produce additional discovery relating to the broader investigation in this case, and
12 the government has agreed to produce this discovery to defense counsel. For these reasons, the
13 defense requests additional time to review the discovery and to assess this case, and the parties
14 agree that this is an appropriate reason to continue this case until December 12, 2011.

15 The parties stipulate and agree that the ends of justice served by this continuance
16 outweigh the best interest of the public and the defendants in a speedy trial. The parties further
17 agree that the failure to grant this continuance would unreasonably deny counsel for defendants
18 the reasonable time necessary for effective preparation, taking into account the exercise of due
19 diligence. Accordingly, the parties agree that the period of time from November 7, 2011 until
20 December 12, 2011, should be excluded in accordance with the provisions of the Speedy Trial
21 Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking
22 into account the exercise of due diligence.

23 DATED: November 2, 2011

/S/
WADE M. RHYNE
HARTLEY M.K. WEST
Assistant United States Attorneys

1 DATED: November 2, 2011

/S/
KENNETH MCGUIRE
Counsel for Tushar Tambe

3 DATED: November 2, 2011

/S/
GINNY H.K. WALIA
Counsel for Ramakrishna Reddy Karra

6 DATED: November 2, 2011

/S/
GALIA AMRAM PHILLIPS
Counsel for Anji Reddy Dirisinala

8 DATED: November 2, 2011

/S/
ANGELA M. HANSEN
Assistant Federal Public Defender
Counsel for Vishal Dasa

ORDER

Based on the reasons provided in the stipulation of the parties above, the Court hereby
FINDS:

1. Given that this case is related to a larger investigation involving Tri-Valley University and the Indictment in *United States v. Susan Su*, CR 11-00288-SBA, and that the government produced discovery to defendants that includes voluminous computer files from the University that the defense needs to review;


2. Given that the defense has requested additional discovery and that the government has agreed to produce this discovery to the defense;

3. Given that a complete review of the discovery is necessary to the defense preparation of the case and that the failure to grant the requested continuance would unreasonably deny counsel for defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence;

4. Given that the ends of justice served by this continuance outweigh the best interest of the public and the defendants in a speedy trial;

Based on these findings, IT IS HEREBY ORDERED that the STATUS date of November 7, 2011, scheduled at 10:00 a.m., before the Honorable Sandra Brown Armstrong, is vacated and reset for December 12, 2011, at 10:00 a.m. It is FURTHER ORDERED that time is excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), from November 7, 2011 until December 12, 2011.

DATED: __11/4/11


SAUNDRA BROWN ARMSTRONG
United States District Judge